The Interim Report

of the Transportation Sub-Committee

for The British Columbia Premier's Advisory Council

for Persons with Disabilities

RECOMMENDATIONS FOR AN ACCESSIBLE TAXI INDUSTRY

November 1991

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Mandate

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities, established in September 1990, holds the mandate to research/review existing parallel transit systems in British Columbia, explore alternatives for those who cannot use or do not have access to conventional transit, develop provincial policy regarding accessible taxi cabs and make recommendations for the establishment of a province-wide transportation network which will provide full and equal access to persons with disabilities.

Definitions

For the purpose of the Interim Report of the Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities the following terms are defined:

A person who is mobility impaired has a physical, mental or medical condition, either permanent or temporary, that limits his/her ability to use conventional private/public transportation services. This definition includes, among others, the elderly, the neurologically impaired, the sensory impaired, pregnant women and people with injuries.

An accessible taxi is a vehicle equipped to carry a mobility impaired passenger while he/she remains in his/her mobility aid. A vehicle where a passenger cannot be accommodated in his/her mobility aid and is required to transfer into an ambulatory passenger seat, is not, by definition, an accessible taxi.

An accessible taxi driver is a person holding an upgraded Class 4 Driver's license.

An equitable accessible taxi service is a service "having or exhibiting equity: dealing fairly and equally with all concerned." More specifically, an equitable accessible taxi service for persons with mobility impairments offers a call response time, quality of service and level of passenger safety comparable to the taxi service experienced by the general public. Equitable accessible taxi service will be evaluated by the appropriate authorities on the basis of a taxi company's performance as judged by users' response.

Accessible transportation is any mode of transportation capable of accommodating a mobility impaired passenger while he/she remains in his/her mobility aid.

Custom transit is a transportation service, specifically, for people with disabilities.

Paratransit is a transportation service for all passenger groups with priority given to seniors and people with disabilities.

CAN3-D409-M84 are standards set by the Canadian Standards Association for school bus-like vehicles, designed, manufactured or converted for the purpose of transporting physically disabled persons.

B.C Modified CAN3-D409-M84 are interim standards, set by the Transportation Sub-Committee for the Premier's Advisory Council, serving as guidelines to all entities involved in accessible taxi transportation. B.C. Modified CAN3-D409-M84 should be refered to until the Canadian Standards Association and its sustaining members, set new standards, specifically, for accessible taxis.

Revised Version CAN3-D409 are the new standards the Canadian Standards Association and its sustaining members are developing which specifically address accessible taxis.

Executive Summary

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities' philosophy is based on the principle of empowerment. All individuals have the power, initiative and responsibility to make things happen and evoke change. In theory, accessible transportation is a widely supported ideal. However, the everyday reality experienced by people with disabilities, seeking spontaneous travel, indicates the ideal has not been realized. A fully integrated accessible transportation system will empower persons with disabilities to live full and normal lives.

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities considers the integration of the taxi industry, into the existing accessible transportation network in British Columbia, necessary to fill an existing transportation gap. Presently, custom transit services operate at maximum capacity and the population of persons with disabilities continues to expand with dramatic increases projected over the next three decades. The accessible transportation network therefore, requires further extension, best offered by the 24 hour service provided by taxis.

The Transportation Sub-Committee recommends that appropriate accessible taxi standards, as outlined in B.C. Modified CAN3-D409-M84, be referred to as guidelines, until the Revised Version CAN3-D409 is completed and referenced in B.C. provincial legislation. The Revised Version of CAN3-D409 would also be referenced in the Canadian Motor Vehicle Safety Standards at the federal government level.

Each taxi company, in British Columbia, would have at least one accessible vehicle to provide a transportation service comparable to the service offered to the general public. A provincial capital cost subsidy to a maximum of $15,000 or 100% of the cost of conversion, whichever is less, per accessible taxi should be made available to taxi companies whose applications are accepted. Taxi companies have nine months to comply with the regulations, after their adoption. All Class 4 Driver's License holders and future Class 4 Driver's License applicants will be required to successfully complete an upgraded Class 4 Driver's License training program which would inform drivers on proper handling, securement and sensitivity issues related to persons with disabilities.

"Special Class" licenses issued by municipalities should be eliminated, to create an environment of open competition in the accessible taxi market.

The Transportation Sub-Committee for the Premier's Advisory Council for Person's with Disabilities' has made recommendations municipally, provincially and federally for the provision of an accessible taxi service to people with disabilities in the province of British Columbia.

RECOMMENDATIONS FOR AN ACCESSIBLE TAXI INDUSTRY

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities recommends that:

1) **The Motor Vehicle Act of B.C. adopt the Canadian Standards Association's Revised Version CAN3-D409, upon its completion, as the standard acceptable for accessible taxis.**

2) **B.C. Modified CAN3-D409-M84 act as the existing guideline for accessible taxis, manufacturers, owners and inspectors until the Canadian Standards Association's Revised Version CAN3-D409 is adopted.**

3a) **All taxi companies operating in B.C., under the Motor Carrier Commission's regulation, have a sufficient number of accessible taxis to provide an equitable service to all members of the population requiring accessible transportation. Each taxi company is required to have, at least, one accessible vehicle in its fleet.**

3b) **The Motor Carrier Commission be guided by the definition of "equitable accessible taxi service" described on page 3 of this report, in determining the appropriate number of accessible taxis to be operated by taxi companies.**

4) **All taxi companies operating in B.C., under Motor Carrier Commission regulation, meet the requirements stated above within nine months of the adoption of the proposed regulation to achieve equitable accessible taxi service for all persons who remain in mobility aids during transit.**

5) **The Minister of the Attorney General and the Motor Vehicle Branch require upgraded Class 4 Driver's License training to include handling, securement and sensitivity training related to people with disabilities, as part of the requisite training for obtaining a Class 4 Driver's License. All Class 4 Driver's License holders and future applicants are required to successfully complete upgraded Class 4 Driver's License training, within one year of the adoption of the proposed regulation.**

6) **"Special Class" licenses, issued by municipalities, be eliminated.**

7) **A provincial capital cost subsidy, to a maximum of $15,000 or 100% of the cost of conversion, whichever is less, per accessible taxi be made available to taxi companies which make applications, to make the provision of accessible taxis financially viable. This program could be called the Accessible Taxi Subsidy Program.**

(Refer to Pages 9-15 for an outline of responsibilities of Taxi Companies, the Province, the Federal Government and Municipalities, and the Recommendations which apply to various levels of government.)

Accessible Taxis, the Vital Link in Multi-Modal Accessible Transportation

The mandate of the Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities is to establish an integrated province wide transportation network which will provide full and equal access to all persons requiring accessible transportation in British Columbia. Multi-modal accessible transport is essential for people who are mobility impaired. Currently, some buses, trains, planes and taxis provide accessible services within the existing transportation network.

Custom transit services, such as handyDART, accessible conventional service, such as some B.C. Transit buses, and various paratransit services in smaller communities, meet most of the service demand in the accessible transportation market. Unfortunately, these modes of transportation do not meet all the needs of the mobility impaired population all the time. Bookings must often be made well in advance of travel and travel is offered only during certain scheduled times of certain days. Consequently, transportation restrictions continue to be experienced by the mobility impaired.

An expansion of the services of accessible taxis will help bridge the existing accessible transportation gap. Only taxicabs are available for spontaneous bookings 24 hours a day, 7 days a week. In most areas, taxi cabs provide the vital link necessary, in the existing transportation network, to adequately service people with accessible transportation needs in rural and urban British Columbia.

All people have the right to access services, community activities and their place of employment. These rights are clearly stated in Section 3 of the B.C. Human Rights Act and Section 15 of the Canadian Charter of Rights and Freedoms. These rights cannot be achieved, in our modern society, without accessible transportation. Simply put, all people have the right to get to where they want to go. Opportunities for employment, education, social life and the choice of neighbourhood to reside in are curtailed for mobility impaired persons, due to the absence of a suitable accessible network of transportation. People who are mobility impaired, or requiring accessible transportation, desire to be treated with dignity and as "normal" citizens experiencing integrated independence. Discrimination can be rectified by placing transportation systems in place which service the needs of the mobility impaired.

The number of people requiring accessible transportation will increase markedly in the next three decades. The percentage of elderly in the greying society of the developed world is expected to double every generation until 2020[1]. Along with the increasing number of elderly is the increasing number of de-institutionalized who are now being mainstreamed into society. Demand from nursing homes, hospital day programs, senior's centers and other institutions will also increase in the future. Decentralization and rapid growth in the suburban population have resulted in the establishment of group homes, care facilities and medical clinics **outside** the

urban core. However, accessible transportation is mainly available in the more densely populated **urban** areas. Obviously, an accessible transportation network is necessary to service the increasing number of mobility impaired residing in the suburbs and provide a link to the urban core.

Future provincial population forecasts for the province of British Columbia show that between 1989 to 2016 the population will increase by 54% to approximately 4 million. As of June 1991, the population of British Columbia was 3,213,200 with 14.2 percent of that population being disabled (456,274 people). It is projected 17.3% of the British Columbia population will be disabled by the year 2016 (692,000 people)[2]. This shows an increase of 235, 726 people with disabilities in British Columbia by 2016. People with disabilities will comprise a significant sector of the consumer market and must obviously, be included in future transportation planning.

B.C Stats uses the 1986 Canadian Census - Disability Rate With Age, when it makes its disabled elderly population projections[3]. According to the 1986 Canadian Census, 34.2 % of the elderly between the ages of 65 - 74 and 53.3% of the elderly between the ages of 75 - 84 were disabled. Using 1946 to mark the onset of the baby boom, the first of the baby boomers will turn 65 in 2011. The proportion of people older than 65 will be significantly larger than the proportion of people older than 65, surveyed in the 1986 Canadian Census. This means the actual number of elderly who will be disabled could be **underestimated**. More than 17.3% of the elderly babyboomer population, as discussed, in the previous paragraph, could be disabled or have mobility impairments by the time they reach retirement.

British Columbia has always experienced an influx of retiring residents from all parts of Canada and other parts of the world. This trend will undoubtedly continue as the milder climates of British Columbia are sought out by the aging baby boomers. The seniors' tourism market presents great potential for British Columbia. The most popular activities for seniors are observing the countryside, city-related activities and tours[4]. Accessible transportation will improve the delivery of these tourism services for the elderly. Seniors will also be living longer due to an improved knowledge of nutrition, a decrease in smoking, a more physically active life and more advanced medical treatments throughout their lifespan. Consequently, in the years to follow, we can look forward to **explosive growth** in the elderly babyboomer population[5].

Accessible multi-modal transportation has become necessary as the disabled population expands and custom transit systems can no longer service all people requiring accessible transportation. User dissatisfaction with custom transit, such as handyDART, often arises due to the long lead time required to make bookings and limited opportunity for spontaneous travel. These problems are particularly evident in small B.C. communities. Smaller communities usually have very limited hours of paratransit operation and little evening and/or weekend service. These factors have led to the exploration of other transportation industries with the capability to offer a more complete service to the mobility impaired population. The most economically and socially feasible link to improve the transportation network has proven to be the twenty four hour service provided by the taxi industry.

BC Transit Taxi Supplement Program

BC Transit implemented a Taxi Supplement Program in the fiscal year of 1983-1984. The Taxi Supplement Program allows handyDART, to contract with taxis, to carry handyDART's overload of passengers. The use of taxis to supplement handyDART has grown significantly since the inception of the Taxi Supplement Program. The main problem encountered by BC Transit with the Taxi Supplement Program, is that taxi drivers are not adequately trained to service people with mobility impairments[6]. Taxis play a crucial role in B.C. custom transit service. However, appropriate driver training is essential to provide a fully satisfactory service.

Custom transit services have a higher cost/ride ratio than the cost/ride ratio of taxis contracted to supplement custom transit. In Victoria, the direct cost of operation, from April 1, 1990 to March 31, 1991(one year period) for handyDART was $10.88 per ride with a total number of 110,100 passenger trips, in comparison to $7.61 per taxi ride with 4,065 passenger trips. In Vancouver, from April 1991 to August 1991 (five month period), the direct cost of operation for handyDART was $14.83 per ride with a total number of 287,524 passenger trips and $12.33 for taxis with a total number of 11, 497 passenger trips[7].

People with mobility impairments place an overwhelming demand on custom and paratransit services in Vancouver, Victoria, small communities and rural areas. The increased participation of accessible taxis in the accessible market will relieve some of the pressure on custom transit services and decrease costs incurred by organizations such as group homes, senior's centers, retirement complexes etc. previously having to rely on their own vehicles for transporting their residents on a 24 hour basis. The main benefit of using a taxi service is, payment is made for only the service provided. No capital or maintenance costs for a vehicle are incurred. In brief, taxis are cost effective.

B.C. Transit - Taxi Saver Program

The B.C. Transit - Taxi Saver Program, introduced July 1, 1991, allows individuals with a HandyPass and therefore eligible to use handyDart, to purchase coupons for subsidized taxi service. The Taxi Saver program allows spontaneous travel opportunities for the mobility impaired throughout the Vancouver region. Participants in the program can call taxi companies of their choice and book service directly, at a discount fare.

Presently, rural areas offer limited services to accommodate individuals requiring alternative modes of transportation. To meet the needs of smaller communities, in the future, the Taxi Saver subsidy should be offered in all areas of British Columbia.

To introduce taxi companies and accessible taxi service users to the concept of multi-modal accessible transportation, in the rural areas of British Columbia, B.C. Transit should build the necessary support service provided by taxi companies in Vancouver and Victoria, into all their existing community services. This could be done by using taxis, as often as possible, for overloads and peak periods. The introduction of the Taxi Saver Progam in isolated rural areas will provide an essential service for individuals requiring accessible transportation.

A newly introduced accessible transportation service is often not immediately utilized at maximum capacity, by the residents within a community. A corresponding adjustment to lifestyle must be made, over time, to fully utilize a new transportation system. An incease in ridership takes time to develop for people living in an area with no previous accessible transportation service. This usage pattern should be kept in mind when accessible transportation pilot projects are evaluated for future viability. Adequate adaptation time must be allowed for ridership to develop when accessible transporation is newly introduced into a community.

Recommendations for the Taxi Industry at the Provincial Level

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities recommends that:

1) **The Motor Vehicle Act of B.C. adopt the Canadian Standards Association's Revised Version CAN3-D409, upon its completion, as the standard acceptable for accessible taxis.** Of utmost importance are the standards addressing vehicle interior height, mobility aid entrance height, orientation of and available space for passenger seating. The passenger/mobility aid securement system and ramp/lift incorporated in the vehicle must be durable, of appropriate strength and construction to safely transport any person while he/she remains in his/her mobility aid.

2) **B.C. Modified CAN3-D409-M84 act as the existing guideline for accessible taxis, manufacturers, owners and inspectors until the Canadian Standards Association's Revised Version CAN3-D409 is adopted.**

3a) **All taxi companies operating in B.C., under the Motor Carrier Commission's regulation, have a sufficient number of accessible taxis to provide an equitable service to all members of the population requiring accessible transportation. Each taxi company is required to have, at least, one accessible vehicle in its fleet.** By regulating taxi companies under Motor Carrier Commission authority, almost the entire taxi industry in British Columbia will have to meet requirements to provide equitable, accessible service.

3b) **The Motor Carrier Commission be guided by the definition of "equitable accessible taxi service" described on page 3 of this report, in determining the appropriate number of accessible taxis to be operated by taxi companies.**

4) **All taxi companies operating in B.C., under Motor Carrier Commission regulation, 15 meet the requirements stated above within nine months of the adoption of the proposed regulation to achieve equitable accessible taxi service for all persons who are mobility impaired.**

5) **The Minister of the Attorney General and the Motor Vehicle Branch require upgraded Class 4 Driver's License training to include handling, securement and sensitivity training related to people with disabilities, as part of the requisite training for obtaining a Class 4 Driver's License. All Class 4 Driver's License holders and future applicants are required to successfully complete upgraded Class 4 Driver's License training, within one year of the adoption of the proposed regulation.** Training would include authorized instruction on the handling/securement of persons requiring transportation with the assistance of mobility aids and of persons who are medically frail. Questions concerning passenger safety, proper mobility aid securement/mobility aid user restraint and sensitivity training related to people with disabilities should be included in the training program. An appropriate Driver Training manual should be developed and approved, in consultation with, the Transportation Sub-Committee for the Premier's Advisory Council for Person's with Disabilities and should be made available to all testing authorities.

6) **"Special Class" licenses, issued by municipalities, be eliminated.** The existence of "Special Class" licenses, such as the existing "Class D" licenses in Vancouver or "Class H" licenses in Burnaby often requires excessive and unnecessary regulation. Presently, Vancouver Taxi holds a monopoly on Class "D" licenses in Vancouver. This means Vancouver Taxi could be the only company servicing participants in the B.C. Transit, Taxi Saver Program. The natural forces of competition would be absent and the quality of service could not be readily challenged.

   The Transportation Sub-Committee for the Premier's Advisory Council for Person's with Disabilities believes that open competition provides a healthier environment for providing quality service to consumers in the accessible transportation market. The elimination of "Special Class" licenses, by municipalities, will ensure all taxi companies are able to participate on an equal basis in serving the accessible taxi market.

7) **A provincial capital cost subsidy, to a maximum of $15,000 or 100% of the cost of conversion, whichever is less, per accessible taxi be made available to taxi companies which make applications, to make the provision of accessible taxis financially viable. This program could be called the Accessible Taxi Subsidy Program.** This subsidy should be made available on a one time per vehicle basis on approval of application.

   The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities has determined the maximum upper recommended limit of subsidy, for conversion of a vehicle to an accessible taxi, is up to $15,000 per vehicle[8].

Present trends for facilitating the conversion of vehicles to make them accessible are developing in various areas in North America. Ontario is allowing a subsidy of up to $10,000 to taxi companies adding an accessible vehicle to their fleet. The Americans with Disabilities Act, "*Design, Guidelines Qualifying for the Tax Advantages of Section 190*", provides a tax incentive to businesses to make their facilities and vehicles accessible to people who are mobility impaired. Under Section 190, qualified architectural and transportation barrier removal expenses are fully deductible up to a maximum of $35,000 for each taxable year. A subsidy of up to $15,000, as recommended by the Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities is comparable to the subsidy being offered in Ontario and far lower than the tax incentive offered in the United States.

To accommodate future advancements in barrier free transportation, various areas throughout North America are providing incentives at a federally legislated level and/or a provincial level. These steps are vital to encourage the private sector to enter the accessible transportation market and assist them in their adaptation to providing a service to a new consumer group with unique needs.

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities recognizes that economics plays a significant role in the implementation of an accessible taxi service, the promotion of manufacturing and the future use of accessible taxis. We remain confident that the introduction of the B.C. Transit Scrip System, the Taxi Supplement Program and the Accessible Taxi Subsidy Program will greatly assist all taxi operators entering the accessible taxi market. The presence of the taxi industry in the accessible transportation market, knits both urban and rural British Columbia, and promotes further move-ability for persons who are mobility impaired.

Responsibilities of Taxi Companies in the Accessible Taxi Industry

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities recommends that taxi companies:

1) Inform all accessible taxi drivers that an integral part of their target market is the mobility impaired.

2) Reinforce the concept that future market trends show the accessible taxi consumer market is growing dramatically and is a source of considerable revenue. To gain and maintain a competitive edge, client service is the key factor.

3) Inform all existing taxi drivers they must successfully complete the upgraded Class 4 Driver's License program requirements, within one year of the adoption of the program. Drivers who have not upgraded their Class 4 Driver's License, within the specified time, will not be allowed to continue driving a commercial vehicle for hire.

4) Inform their drivers that BC Transit and its municipal partners, strongly encourage their contractors to only use taxi companies that offer an equitable accessible taxi service. These taxi companies will be given preference for the B.C. Transit Scrip System - Taxi Saver Program, Taxi Supplement benefits and the provincial capital cost subsidy program.

5) Accessible taxi owners and companies operating accessible taxis in their fleet should ensure their vehicles comply with B.C. Modified CAN3-D409-M84 and upon completion, the Revised Version of CAN3-D409.

Responsibilities of the Province of British Columbia in the Accessible Taxi Industry

In Canada, public transportation is primarily a provincial and municipal responsibility. Since 1988, the Motor Vehicles Branch of B.C has had the authority to regulate accessible taxi standards. The Motor Carrier Commission has the mandate to promote adequate and safe transportation services at fair and just prices. Present standards, basically state, an accessible taxi must conform to standards acceptable to the inspector. The inspector is advised to **refer** to CAN3-D409-M84 standards and any applicable municipal requirements as guidelines, during vehicle inspection. This set of inspection criteria is vague and places no responsibility on any designated authority. Final accessible taxi inspection approval is based on the Motor Vehicle Branch inspector's personal interpretation of the guidelines[9].

The Province of British Columbia's vehicle inspection requirements for modified vehicles, such as accessible taxis, are stated in Division 25, 10 and 7 of the Motor Vehicle Act Regulations. No specific standards are legislated provincially and CAN3-D409-M84 (specifically, standards for passenger seating, orientation of wheelchair, space requirements for wheelchair, wheelchair securement system and wheelchair occupant restraint system) can be referred to as guidelines[10]. Often, no reference is made. The Transportation Sub-Committee for the Premier's Advisory Council for Person's with Disabilities has provided B.C. Modified CAN3-D409-M84 to be refered to as interim accessible taxi standards while the Revised Version of CAN3-D409 is developed.

Ontario is the only province in Canada that has requirements for accessible taxis written into legislation. The Ontario Highway's Act states it is illegal to sell any new vehicle that has been modified to become wheelchair accessible, unless, the vehicle and the vehicle's passenger restraint and wheelchair securement system conform to CAN3-D409-M84.

The responsibility of adopting accessible taxi standards should be placed in the hands of the provinces. An agency like the Canadian Standards Association determines and defines standards for accessible taxis in consultation with the provinces. These standards would then be referenced in all provincial legislations. The provinces would then administer the implementation of these standards to the operators. All vehicle inspectors would perform accessible taxi inspections according to the strict criteria outlined in standards referred to in provincial legislation and any applicable criteria described in appropriate municipal by-law/s. Presently, the Province of British

Columbia is a sustaining member of the Canadian Standards Association and actively involved in the revision of CAN 3-D409-M84.

Recommendations at a Provincial Level For An Accessible Taxi Industry

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities recommends that:

1) B.C. Modified CAN3-D409-M84 be refered to as a guideline until the Revised Version of CAN3-D409 is completed and referenced in British Columbia provincial legislation.

2) The Province of British Columbia officially assume responsibility for the administration of the Revised Version of CAN3-D409 to the municipalities.

3) Provincial vehicle inspectors be responsible for the inspection of all modified and new accessible taxis to ensure compliance with the current B.C. Modified CAN3-D409-M84 and in the future, the Revised Version of CAN3-D409, with thorough inspection of the mobility aid securement system and the mobility aid occupant restraint system.

4) Vehicles serving the accessible taxi transportation market meet the standards of B.C. Modified CAN3-D409-M84 and in the future, the Revised Version of CAN3-D409.

5) The Province of British Columbia, as determined by BC Transit Systems, and municipalities where appropriate, participate in the BC Transit Scrip System- Taxi Saver Program.

6) The Province of British Columbia participate in the provincial capital cost subsidy program (maximum of $15,000 or 100% of the cost of vehicle conversion, whichever is less), as outlined in this report, to make the provision of accessible taxis financially viable.

7) All vehicles qualifying for the provincial capital cost subsidy program and the BC Transit Scrip System-Taxi Saver Program meet the specifications of B.C. Modified CAN3-D409-M84 and in the future, the Revised Version of CAN3-D409 when it is referenced in legislation.

8) All drivers applying for a Class 4 Driver's License successfully complete an upgraded Class 4 Driver's License training program before being granted a license.

9) An upgraded Class 4 Driver's License program, offered by authorized agents, appropriately educate drivers on issues pertinent to the transportation of individuals requiring accessible transportation.

10) Essential issues to be addressed in the upgraded Class 4 Driver's License training program from the consumer's perspective are:

- An overview of conditions and needs of individuals utilizing accessible transportation ie. physiological and psychological differences, sensitization to these differences and an appreciation of how a person using a mobility aid or having other special needs, experiences the act of being loaded/unloaded into an accessible vehicle.

11) Essential issues to be addressed in the upgraded Class 4 Driver's License training program from the accessible taxi driver's perspective:

- Proper operation of lifts/ramps under normal and hazardous conditions, correct manipulation of varied mobility aids, knowledge of special needs of people requiring accessible transportation.

12) The Canadian Urban Transit Association and BC Transit be consulted on the necessary training components to be included in the updated Class 4 Driver's License training program.

Responsibilities of the Federal Government of Canada in the Accessible Taxi Industry

The federal government of Canada is responsible for vehicle safety. Criteria for vehicle safety is outlined in the Canadian Motor Vehicle Safety Standards(CMVSS). These standards set specifications for essential components of a vehicle such as the thickness of metal in the vehicle floorboard, the wattage of headlamps, etc. If the original stucture of a vehicle is stretched or its roof is raised, as is the case with accessible taxis, CMVSS do specify certain structural requirements. CMVSS **do not** address standards for equipment installed in an accessible taxi ie. ramp, lift, passenger restraint system, mobility aid securement system or acceptable dimensions for the mobility aid entrance door, etc. An accessible taxi could pass CMVSS inspection without ever having its passenger restraint or mobility aid securement systems examined.

Supporting Recommendations At The Federal Level For An Accessible Taxi Industry

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities recommends that:

1) Canada make a legislative committment to accessible transportation.

2) A clause be included in the Canadian Motor Vehicle Safety Standards specifically, describing, appropriate structural and installed equipment criteria for vehicles modified to operate as accessible taxis.

3) The appropriate criterion to be referenced in CMVSS is the Revised Version of CAN3-D409, Motor Vehicles for the Transportation of Physically Disabled Persons.

Responsibilities of Municipalities in British Columbia in the Accessible Taxi Industry

Municipalities grant licences to taxis that operate exclusively within municipal boundaries. If taxis operate outside municipal limits, as they frequently do, the Motor Carrier Commission in agreement with the municipality, authorizes whether a commercial vehicle for hire license will be granted or not.

The City of Vancouver issues "Class D" licenses to taxis equipped to carry the general public while giving priority to wheelchair users. Vancouver municipal inspection criteria, for dual taxis, are outlined in Vehicles for Hire By-Law No. 6066 (refer to Appendix A). The specific criteria are that the vehicle should have four doors, a sufficiently high ceiling and door to permit easy access for the disabled and elderly persons. The International Symbol of Accessibility for Disabled Persons should be posted on each side of the vehicle. These criteria are non-specific and do not ensure mobility impaired passenger safety or comfort.

The municipalities of Richmond, New Westminster and Burnaby also have provisions for "Special Class" licenses for wheelchair accessible taxis operating in their jurisdiction. Wheelchair accessible taxis operate in other municipalities in British Columbia but have no municipal by-laws regulating accessible taxis.

Supporting Recommendations At The Municipal Level For An Accessible Taxi Industry

The Transportation Sub-Committee for the Premier's Advisory Council for Persons with Disabilities recommends that:

1) Municipalities be involved in the implementation of a multi-modal accessible transportation system for people who require accessible transportation.

2) Municipalities, in consultation, with the Motor Carrier Commission be actively involved in reviewing the accessible taxi service fee structures charged to people requiring accessible transportation. An issue that could be reviewed is the possibility of charging a minimum fee for short trips. A flat service charge at a reasonable fixed amount or a securement fee could be charged to compensate drivers for extra time required for loading.

3) The municipality be involved in monitoring taxi companies' service levels, fare structures, times and days of available equitable accessible taxi service.

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